

**UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF TEXAS  
WACO DIVISION**

**BCS SOFTWARE, LLC,**

**Plaintiff**

**v.**

**ZOHO CORPORATION**

**Defendant**

**Case No. 6:21-cv-0051-ADA**

**JURY TRIAL DEMANDED**

**FIRST UNOPPOSED MOTION FOR EXTENSION**

On behalf of the Parties, Plaintiff BCS Software, LLC respectfully submits this Unopposed Motion for Extension of Time for Defendant Zoho Corp. to Respond to Plaintiff's Original Complaint.

Plaintiff filed this lawsuit on January 19, 2021. Defendant Zoho Corp. was served with the Summons and Complaint on January 25, 2021. Thus, Zoho's deadline to respond to the Complaint is currently February 15, 2021.

Counsel for Defendant has met and conferred with counsel for Plaintiff, who indicated that Plaintiff does not oppose Defendant Zoho's request for a 30-day extension of time to answer or otherwise respond to the Complaint. With this extension, Defendant Zoho's deadline for response would be March 17, 2021. This extension is necessary to allow Defendant sufficient time to finalize its investigation of the Complaint allegations and respond accordingly.

Plaintiff, therefore, and on behalf of both Parties, respectfully requests that the Court extend the deadline for Defendant Zoho's response to Plaintiff's complaint to March 17, 2021. A

Proposed Order granting this unopposed motion is attached.

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Dated: February 8, 2021

Respectfully Submitted

/s/ M. Scott Fuller

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**ATTORNEYS FOR PLAINTIFF  
BCS SOFTWARE, LLC**

**CERTIFICATE OF CONFERENCE**

Counsel for Defendant conferred with counsel for Plaintiff on February 8, 2021 and the undersigned counsel for Plaintiff does not oppose the relief requested herein.

/s/ M. Scott Fuller

M. Scott Fuller

**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that a true and correct copy of the above and foregoing document has been served on February 8, 2021, to all counsel of record who are deemed to have consented to electronic service via the Court's CM/ECF system.

/s/ M. Scott Fuller

M. Scott Fuller